

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (NEWARK)
Caption in Compliance with D.N.J. LBR 9004-1(b)

Robertson, Anschutz & Schneid, PL

6409 Congress Avenue, Suite 100

Boca Raton, FL 33487

Telephone No.: 973-575-0707 (local)

Telephone No.: 561-241-6901 (main)

Attorneys for Secured Creditor

Shauna Deluca, Esq. (SD-8248)

In Re:

Alice A. Jay

***aka* Alice Ann Jaroszewsky,**

Debtor.

Case No.: 19-24216-JKS

Chapter: 7

Hearing Date: November 12, 2019

Judge: John K. Sherwood

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:
November 12, 2019 at 10:00 A.M.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor-</i> Alice A. Jay 108 Meyerville Road Chatham, NJ 07928	<i>Trustee-</i> Jay L. Lubetkin Rabinowitz, Lubetkin & Tully, L.L.C. 293 Eisenhower Parkway, Suite 100 Livingston, NJ 07039	<i>U.S.Trustee-</i> U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
---	--	--

PLEASE TAKE NOTICE that on November 12, 2019, at 10:00 a.m., or as soon thereafter as counsel may be heard, Robertson, Anschutz & Schneid, PL, attorneys for Reverse

Mortgage Solutions, Inc., the within creditor ("Creditor"), shall move before the Honorable John K. Sherwood, United States Bankruptcy Judge, at 50 Walnut Street, 3rd Floor, Newark, NJ 07102, Courtroom 3D, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, 50 WALNUT STREET, NEWARK, NJ 07102**, and simultaneously served on Secured Creditor's counsel, **ROBERTSON, ANSCHUTZ & SCHNEID, PL, 6409 CONGRESS AVENUE, SUITE 100, BOCA RATON, FL 33487**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: October 17, 2019

Robertson, Anschutz & Schneid, P.L.

Attorneys for Secured Creditor

6409 Congress Avenue, Suite 100

Boca Raton, FL 33487

Telephone No.: 973-575-0707 (local)

Telephone No.: 561-241-6901 (main)

By: /s/ Shauna Deluca

Shauna Deluca, Esquire

Bar ID: SD-8248

Email: sdeluca@rasflaw.com